



**BellSouth Telecommunications, Inc.**

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**Guy M. Hicks**  
General Counsel

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December 8, 2000

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: *Approval of the Amendments to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and Rhythms Links, Inc. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996.*

Docket No. ~~00-00656~~

*cc-01081*

Dear Mr. Waddell:

Pursuant to Section 252(e) of the Telecommunications Act of 1996, Rhythms Links Inc. and BellSouth Telecommunications, Inc. are hereby submitting to the Tennessee Regulatory Authority the original and thirteen copies of the attached Petition for Approval of the Amendments to the Interconnection Agreement dated January 8, 1999. The first amendment changes the rates for 2W ADSL and 2W HDSL loops. The second amendment adds IDSL-Compatible loops to the agreement.

Thank you for your attention to this matter.

Sincerely yours,

Guy M. Hicks

cc: Bob Rowe, Rhythms Links Inc.

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In re: *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and Rhythms Links Inc. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*

Docket No. 00-00656  
00-01081

**PETITION FOR APPROVAL OF THE**  
**AMENDMENT TO THE INTERCONNECTION AGREEMENT**  
**NEGOTIATED BETWEEN BELL SOUTH TELECOMMUNICATIONS, INC.**  
**AND RHYTHMS LINKS INC.**  
**PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996**

COME NOW, Rhythms Links Inc. ("Rhythms Links") and BellSouth Telecommunications, Inc., ("BellSouth"), and file this request for approval of the Amendments to the Interconnection Agreement dated January 8, 1999 (the "Amendments") negotiated between the two companies pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, (the "Act"). In support of their request, Rhythms Links and BellSouth state the following:

1. Rhythms Link and BellSouth have successfully negotiated an agreement for interconnection of their networks, the unbundling of specific network elements offered by BellSouth and the resale of BellSouth's telecommunications services to Rhythms Links. The Interconnection Agreement was approved by the Tennessee Regulatory Authority ("TRA") on August 24, 1999.

2. The parties have recently negotiated two Amendments to the Agreement. The first amendment dated August 14, 2000 changes the rates for 2W ADSL and 2W HDSL loops. The second amendment dated October 16, 2000 adds IDSL-Compatible loops to the agreement. A copy of the Amendments are attached hereto and incorporated herein by reference.

3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, Rhythms Links and BellSouth are submitting their Amendment to the TRA for its consideration and approval. The Amendment provides that either or both of the parties is authorized to submit this Amendment to the TRA for approval.

4. In accordance with Section 252(e) of the Act, the TRA is charged with approving or rejecting the negotiated Amendment between BellSouth and Rhythms Links within 90 days of its submission. The Act provides that the TRA may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of the agreement or any portion of the agreement is not consistent with the public interest, convenience and necessity.

5. Rhythms Links and BellSouth aver that the Amendment is consistent with the standards for approval.

6. Pursuant to Section 252(i) of the Act, BellSouth shall make the Agreement available upon the same terms and conditions contained therein.

Rhythms Links and BellSouth respectfully request that the TRA approve the Amendment negotiated between the parties.

This 8<sup>th</sup> day of Dec, 2000.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

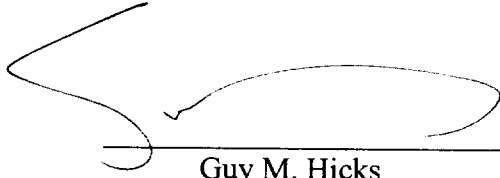
By: 

Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6301  
Attorney for BellSouth

## CERTIFICATE OF SERVICE

I, Guy M. Hicks, hereby certify that I have served a copy of the foregoing Petition for Approval of the Amendments to the Interconnection Agreement on the following via United States Mail:

Bob Rowe  
Rhythms Links Inc.  
2609 Monterey Drive  
Pittsburgh, PA 15241



Guy M. Hicks

**AMENDMENT  
TO  
INTERCONNECTION AGREEMENT BETWEEN  
RHYTHMS LINKS INC. AND  
BELLSOUTH TELECOMMUNICATIONS, INC.**

**DATED January 8, 1999**

Pursuant to this Amendment (the "Amendment"), Rhythms Links Inc. ("Rhythms") and BellSouth Telecommunications, Inc. ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby amend that certain Interconnection Agreement between the Parties dated January 8, 1999 (the "Interconnection Agreement").

WHEREAS, the Parties entered into an Interconnection Agreement on January 8, 1999; and


WHEREAS, the Parties desire to amend that Interconnection Agreement.

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows:

1. The 2-Wire ADSL/HDSL rates contained in Attachment 11, Exhibit 9-TN are hereby revised as follows:

|   |       |          |
|---|-------|----------|
| 2-Wire Asymmetrical Dig Subscriber Line (ADSL) Compatible Loop      | USOC  | TN*      |
| Per Month   | UAL2X | \$12.16  |
| NRC - First   | UAL2X | \$270.01 |
| NRC - Add'l   | UAL2X | \$234.63 |
| NRC - Disconnect - First  | SOMAN | \$74.54  |
| NRC - Disconnect - Add'l  | SOMAN | \$39.14  |
| Order Coordination for Specified Conversion Time                    |       | \$34.29  |
| 2-Wire High Bit Rate Digital Subscriber Line (HDSL) Compatible Loop |       |          |
| Per Month   | UHL2X | \$8.78   |
| NRC - First   | UHL2X | \$270.01 |
| NRC - Add'l   | UHL2X | \$234.63 |
| NRC - Disconnect - First  | SOMAN | \$74.54  |
| NRC - Disconnect - Add'l  | SOMAN | \$39.14  |
| Order Coordination for Specified Conversion Time                    |       | \$34.29  |

\* These rates are interim, subject to true-up once rates are ordered by the TRA.

2. This Amendment shall have an effective date of 8/1/, 2000. 

3. All other provisions of the Interconnection Agreement dated January 8, 1999 shall remain in full force and effect.

4. Either or both of the Parties shall submit this Amendment to the appropriate Commission for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the Parties hereto have caused this Amendment to the Interconnection Agreement to be executed by their respective duly authorized representatives on the date indicated below.

**Rhythms Links Inc.**

By: Eric H. Geis

Name: Eric H. Geis

Title: Secretary

Date: 8/1/00

**BellSouth Telecommunications, Inc.**

By: Jerry D. Hendrix

Name: Jerry D. Hendrix

Title: Senior Director

Date: 8/14/00

AMENDMENT  
TO THE  
INTERCONNECTION AGREEMENT BETWEEN  
RHYTHMS LINKS, INC. and  
BELLSOUTH TELECOMMUNICATIONS, INC.  
DATED January 8, 1999.

Pursuant to this Agreement (the "Amendment"), BellSouth Telecommunications, Inc. ("BellSouth") and Rhythms Links Inc. ("Rhythms"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement, for the states of AL, FL, GA, KY, LA (Certification Number TSP00336), MS, NC, SC and TN, between the Parties dated January 8, 1999 ("Interconnection Agreement").

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, BellSouth and Rhythms hereby covenant and agree as follows:

1. Attachment 2 of the Interconnection Agreement is hereby amended to include a new section 2.4 as follows:
  - 2.4 An IDSL-Compatible Loop
    - 2.4.1 Due to technical limitations associated with certain DLC systems, certain ports on DLC systems do not support ISDN Digital Subscriber Lines (IDSL).
    - 2.4.2 BellSouth will offer the IDSL-Compatible loop as a part of their Unbundled Digital Loop offerings, as an xDSL capable loop. The IDSL-Compatible loop, sometimes referred to as a UDC loop within BellSouth at the time of this addendum, is compatible with IDSL service and has the same physical characteristics and transmission specifications as BellSouth's ISDN-capable loop. The technical specifications which govern this loop are those set forth in BellSouth's TR73600, which is in effect on the date of execution of this amendment.
    - 2.4.3 Like the ISDN-capable loop, the IDSL-Compatible loop may be provisioned on copper or through a DLC system. However, when IDSL-Compatible loops are provisioned using a DLC system, BellSouth will ensure that they are only provisioned on time slots that are compatible with data-only services such as IDSL.

2. The rates for the IDSL-Compatible loop shall be the same as the rates for ISDN loops, subject to true-up when and if BellSouth's proposed rates for the IDSL-Compatible loop are approved and accepted by a state commission.
3. Rhythms shall exclusively order the IDSL-Compatible loop for its IDSL service beginning October 23, 2000. After October 23, 2000 in the event Rhythms inadvertently orders an ISDN capable loop for its IDSL service and some additional work (other than work required to make the ISDN loop meet technical specifications for an ISDN loop) by BellSouth is necessary to enable that loop to support IDSL, BellSouth shall apply an interim rate of \$100.00 subject to true-up. Provided, however, in the event Rhythms orders ISDN capable loops for its IDSL service more than twenty-five (25) times in the first ninety (90) days the interim rate will increase from \$100.00 to \$150.00.
4. All other provisions of the Interconnection Agreement dated January 8, 1999 shall remain in full force and effect.
5. Either or both of the Parties shall submit this Amendment to the appropriate Commissions for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the Parties hereto have caused this Amendment to the Interconnection Agreement be executed by their respective duly authorized representatives on the date indicated below.

**BellSouth Telecommunications, Inc.**

By: 

Name: Jerry D. Hendrix

Title: Senior Director

Date: 10/17/00

**Rhythms Links Inc.**

By: 

Name: Jeffrey Blumenfeld

Title: General Counsel

Date: October 16, 2000